

Doug Hasbrouck, Dist. Chief, NEDO

Acme Scrap
August 9, 1984

Mark Baumgardner, DAPC, NEDO

Surveillance Activities in Ashtabula County

US EPA RECORDS CENTER REGION 5



401943

I conducted special surveillance in Ashtabula County from 7:45 a.m. on Thursday, August 2, 1984, until 12:30 a.m. on Friday, August 3, 1984. This was pre-approved by Bob Goulish and Dennis Bush. A log of activities is attached (Exhibit I).

The purpose of the surveillance was both special and routine. Special attention was given to Sunray Recycling and Acme Scrap. Routine observation of 31 industries under evening atmospheric conditions and second shift operations also was carried out.

Sunray is owned and operated by the same group who own Northway. In the past several months, they have sent several notices to this office concerning removal of asbestos from buildings during demolition or renovation (as per 40 CFR 61.2). Steve Tickerman (DSHWM/NEDO) investigated a complaint against Sunray's facility at 4213 North Bend Road in Ashtabula. Drums of hazardous waste were mysteriously appearing at the site and neighbors say there was activity at night. In the course of the investigation, about 20-30 bags and drums of asbestos were also found and some of the bags had split open. I checked this site several times between 10:30-11:00 p.m. There was no activity, no wastes outside, and the building apparently was secure.

The Ashtabula Township Fire Department has responded to several large fires at Acme Scrap. They have advised us that Acme Scrap is burning insulation off of wire during the night again. SCM Plant II has its western border next to Acme Scrap. During my last two visits to SCM II, Doug Towner, the Plant Manager, has independently volunteered information of open burning at Acme Scrap. I checked this scrap yard at 7:10 p.m. and noted automobiles by the office. I returned at night fall but the cars were gone and there was no activity.

These sites were checked to make sure that things were not out-of-control. I will draft advisory letters to each company. Further investigation may be needed. Given the history of each management, should any significant violations be discovered, I would expect a prompt referral to the AGO would be supported by this office and Central Office.

Routine surveillance on the other companies was also beneficial. Some of these facilities operate different product lines or different rates at night. Less experienced managers and operators are often assigned to second or third shift. Equipment breakdowns may not be remedied as quickly because a full maintenance staff may not be readily available.

I was able to observe the operations under these conditions. Some minor problems were noted that would have only become apparent at a much later date had I not done this. At some point, I will need a State Car with take-home privileges to cover third shift and weekend activities.

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I intend to use this as an auditing (not policing) tool. Many citizens are reassured to hear that we occasionally do this, especially when we answer complaints or attend public hearings. I observed the "open spaces doctrine" as I did this surveillance, yet I was spotted by many of the plant guards. This serves as a gentle reminder that their obligation (as well as ours) extends around-the-clock. I use this and a number of other auditing practices to get a broad and consistent picture which compliments the site inspections. This is why I feel very confident on recommendations made to Central Office. In my opinion, it is important not to get bogged down in bureaucratic mechanics at the expense of ignoring what is actually occurring in the field.

I have attached a typical Monthly Activity Report for your review (Exhibit II). Note that I work with the school systems, hospitals, Ashtabula County Health Department, as well as the industries in the area.

MB:cll

Attachments

cc: Dennis Bush, DAPC, NEDO
Bob Coulish, DAPC, NEDO
Steve Tuckerman, DSHWM, NEDO
Chris Frazier, DSHWM, NEDO
Fred Long, DAPC, NEDO
Tom Rigo, DAPC, Central Office